



DIVISION OF  
ENFORCEMENT

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

July 14, 2023

**By ECF**

Hon. Kenneth M. Karas  
United States District Court  
United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,  
12-CV-6421 (KMK)

Dear Judge Karas:

The Securities and Exchange Commission (“SEC”) writes to respond to Defendant Edward Bronson’s (“Bronson”) request for an asset freeze carve-out of \$31,860.39 (DE 522), days after Bronson consented to an Order not to seek more than \$30,000.00 (DE 521).<sup>1</sup> The SEC does not object to the release of to the agreed-upon \$30,000 in funds from the proceeds of the transaction with Bruce Bent. Thus, the SEC respectfully requests that the Court order that any funds Bent holds that are due to Bronson or Top Knot Inc. and exceed \$30,000 be turned over to the SEC within (5) days of receipt of the Court’s Order. Further, the SEC requests that it be permitted to serve this Order by email on Bruce Bent or his counsel and Bronson or Paul Rachmuth.

Respectfully submitted,  
*s/ Maureen Peyton King*

Both requests are granted.

So Ordered.

7/17/23

---

<sup>1</sup> DE 521 states ‘IT IS FURTHER ORDERED THAT Defendant and Dawn Bronson shall submit to the Court (under seal) and the SEC an accounting showing a need for a carve out of funds from the turnover and a proposed allocation of the \$30,000 carve out he seeks.’ (DE 521, p.3).